U.S. ENVIRONMENTAL PROTECTION AGENCY POLLUTION/SITUATION REPORT ESI-PRP Removal - Removal Polrep





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY Region V

Subject:

POLREP #10

Progress

ESI-PRP Removal

B5YS

Indianapolis, IN

Latitude: 39.9128600 Longitude: -86.2423680

To:

Sue Michael, City of Indianapolis

Tom White, City of Indianapolis

Harry Atkinson, IDEM Ryan Groves, IDEM Megan Nagle, IDEM George Richotte, IDEM

Jason Doerflein, Marion County Health Department

Stephen Jones, Pike Fire Department

Linda Nachowicz, U.S. EPA Region V, ERB 2

Charles Gebien, U.S. EPA Region V John Maritote, U.S. EPA Region V Janet Pope, U.S. EPA Region V

Debbie Keating, U.S. EPA Region V, ESS Karen Kirchner, U.S. EPA Region V, LCD Kendall Moore, U.S. EPA Region V, LCD Susan Perdomo, U.S. EPA Region V, ORC Gary Prichard, U.S. EPA Region V, ORC John Steketee, U.S. EPA Region V, ORC Carol Staniec, U.S. EPA Region V, Water

Kim Cussen, United Water

Nola Hicks, U.S. EPA Region V, ORC

Mark Johnson, ATSDR

Robert Darnell, U.S. Department of Justice

Stan Rigney, IDEM Randy Braun, IDEM USCG NRC, NRC

David Chung, U.S. EPA HQ

Jeff Kelley, U.S. EPA Maupin Natalie, IDEM

Eric Kaufman, Marion County Health Department

Jason Sewell, IDEM

Carol Ropski, U.S. EPA Region V, ESS

Jason Ravenscroft, Marion County Health Department

Sherry Fielding, U.S. EPA HQ

Dan Sparks, USFWS Ed Karecki, USFWS Bob Masbaum, POTW

Kristen Heitman, Providence Wildlife Michael Massonne, City of Indianapolis

From:

Verneta Simon & Anita L. Boseman, On-Scene Coordinators

Date:

7/6/2011

Reporting Period: 6/27/2011 - 7/1/2011

1. Introduction

1.1 Background

Site Number: B5YS Contract Number:

D.O. Number: Action Memo Date: 9/30/2010

Response Authority: CERCLA Response Type: PRP Oversight
Response Lead: PRP Incident Category: Removal Action

NPL Status: Non NPL Operable Unit:

Mobilization Date: 4/6/2011 Start Date: 4/6/2011

Demob Date: Completion Date: CERCLIS ID: INN0051050501 RCRIS ID:

CERCLIS ID: INN0051050501 RCRIS ID: State Notification:

FPN#: Reimbursable Account #:

1.1.1 Incident Category

Bankrupt Commercial Used Oils Facility

1.1.2 Site Description

See POLREP 1

1.1.2.1 Location

4910 West 86th Street, Indianapolis, Indiana 46268

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

See POLREP 1

2.1.2 Response Actions to Date

On June 27, 2011, AVS hauled off 6 loads (33,000 gal) of oily water from the northeast area and east containment to United Water's facility in Cincinnati, OH.

On June 28, 2011, AVS hauled off 12 loads (67,400 gal) of oily water from the solidification pits and

primary separator pits to United Water's facility in Cincinnati, OH.

-AVS hard piped the frac tank/GAC system north of the solids building

-Trihydro personnel discovered that a 55-gal poly sulfuric acid drum had fallen over east of the three solidification pits on the northeast area of the site due to the pallet it was on collapsing.

Trihydro/AVS deployed socks from the adjacent spill kit to prevent the material from further migrating across the surrounding paved surface and into the nearby storm drain.

The drum was placed upright and four 50-pound bags of neutralizing agent (soda ash) were placed on the spilled material to neutralize it and prevent further degradation of the surrounding asphalt.

AVS brought additional soda ash onsite to replace the quantity used for the response activities.

Per Trihydro, a skid steer will be brought onsite on the tomorrow, June 29, 2011, to place the drum into an overpack and prepare it for ultimate shipment and disposal.

An estimated 3-5 gallons of acid may have entered the northeast stormsewer system.

Per Trihydro, they will inspect the remaining pallets to determine if there are any additional integrity issues.

-Trihydro ran the GAC system treating the water of 1 raw water frac tank and pumping it into 1 finish water frac tank.

-Trihydro pumped southwest area water to the City sanitary sewer.

Discharge event information:

-Initial Time: 1254; Initial Reading: 1,109,560 gal -Final Time: 1624; Final Reading: 1,172,080 gal

-Total Volume: 62,520 gal; Average Flowrate: 298 gpm

On June 29, 2011, AVS hauled off 4 loads (22,400 gal) of oily water from the primary separator pit and solidification pits to United Water's facility in Cincinnati, OH and Clean Water's facility in Dayton, OH. -Trihydro continued running the GAC system.

1.75 finish water tanks are currently full of treated water.

A small hole was identified on one of the GAC system tanks and per Trihydro, the manufacturer will be repairing it.

-Focus discharged approximately 6,000 gal of stormwater from the Tank 51 containment into the Focus/WSP frac tank staged north of the administration building.

-Trihydro placed the damaged 55-gal poly sulfuric acid drum into an overpack and moved it into the dehydration building along with 4 other somewhat bulging 55-gal poly drums in order to remove them from the elements and onto a spill pallet.

- Safety Kleen, Trihydro (+4), and Midwest (+5) were on site for a cleanup kick-off meeting.

Trihydro/Safety Kleen/START personnel walked the site with Midwest personnel.

Per Trihydro/Midwest, they will initially be addressing the following:

-Drums/totes management and removal;

-Frac tanks 7-10 and AST 6 emptying/cleaning for potential stormwater storage;

-Hauling out solidified sludge staged north of the solidification pits.

Per Midwest, they intend to haul oily water to United Water in Cincinnati, OH and solidified sludge to Southside Landfill in Indianapolis, IN.

-Safety Kleen, Trihydro, START, Heritage, and Asphalt Materials (+2) met briefly to discuss the AMI-ESI parcel.

The PRP Group does not intend to engage in a "property swap", so AMI/Heritage was instructed to move forward with the permanent stormwater management actions.

Per AMI, they will begin activities late next week or early the week following.

On June 30, 2011, Trihydro continued running the GAC system and both finish water tanks are currently full of treated water.

-Trihydro temporarily repaired the small hole on one of the GAC system tanks and per Trihydro, the manufacturer will be bringing them a replacement tank.

-OSC Verneta Simon, START, City of Indianapolis (+3), United Water, Trihydro (+2) conducted a site walk.

Per Kim Cussen (United Water), Trihydro can transport oily water to United Water during rain events via truck using approved haulers.

Per K. Cussen, United Water will have to discuss discharging northeast area water to the City sanitary sewer with other City personnel (not present).

Per K. Cussen, two separate Special Discharge Agreements will be required for discharge directly to the City sanitary sewer and for hauling northeast area water to the WWTP.

Per Tom White (City of Indianapolis), he will be on site on Tuesday, July 5, 2011, to sample the northeast area water (both treated and untreated).

Per T. White, due to consistently low/NA contaminant levels, the City may decrease sampling

frequency requirements in the southwest area.

Per Mike Massonne (City of Indianapolis), he needs to discuss potential discharge rates for treated water to Oil Creek with other City personnel (not present).

Trihydro shows City personnel their proposed GAC system piping route and Oil Creek discharge point, located southeast of the east containment.

-Chemical, Inc. was on site to remove their 8 totes:

5 sulfuric acid totes;

- -4 stored outside, east of the solidification pits;
- -1 stored in the chemical building;

2 aluminum sulfate totes;

- -1 stored east of the unloading building;
- -1 stored in the chemical building;

1 ferric chloride tote stored in the chemical building

-Aaron Equipment Company was on site as a bidder for LEAF pertaining to equipment for repossession.

START/Aaron were able to locate 4 of the pieces of equipment (centrifuge, screener, stator pump, and submersible pump) east of the solids building. (Photos of the equipment are posted under "Images".)

START/Aaron could not locate the 2 Cornell pumps listed.

On July 1, 2011, Trihydro pumped southwest area water to the City sanitary sewer.

Discharge event information:

-Initial Time: 1020;

Initial Reading: 1,172,080 gal

-Final Time: 1350;

Final Reading: 1,214,050 gal

-Total Volume: 41,970 gal;

Average Flowrate: 200 gpm

- -Per Kristin Heitman (Providence Wildlife), when the mallard ducklings rescued from ESI have attained release criteria, they will be released into a species-appropriate habitat.
- -Trihydro continued hard/flexible piping GAC connections to the City sanitary sewer manway and to the ditch leading to Oil Creek.
- -Brenntag Midsouth, Inc. was on site to remove their 4 totes:

4 empty hypochlorite solution (bleach) totes;

Due to a lack of forklift at the site when the hauler arrived, Brenntag was unable to remove the totes and will be back on site next week to do so.

-EQ was on site and collected waste characterization samples for the DAF tanks, API tanks, and Tank #6.

-Midwest (+4) was on site taking drum samples and testing drum content pH.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs) N/A

2.1.4 Progress Metrics

Waste Stream	Medium	Quantity	Manifest #	Treatment	Disposal
Oily Water	Liquid	2,139,190 gallons		X	
Stormwater*	Liquid	424,956 gallons		X	
Tank 51 Containment	Liquid	335,120 gallons	*****************	X	

2.2 Planning Section

2.2.1 Anticipated Activities

Revised Work Plan

2.2.1.1 Planned Response Activities

None

2.2.1.2 Next Steps

US EPA will provide oversight of PRP Group removal activities.

Tank 51 activities.

The PRP Group will potentially begin drum/tote removal activities on July 1, 2011.

2.2.2 Issues

Groundwater infiltration is suspected in the sanitary sewer system on Site. Trihydro is investigating potential options for mitigating infiltration.

Standing water has been observed in several locations around the site. Warmer weather can lead to mosquito breeding in standing water. EPA has requested that Trihydro address all standing water on site as soon as possible.

Ongoing management of wildlife at the site due to nearby ecosystems.

2.3 Logistics Section

Not applicable.

2.4 Finance Section

2.4.1 Narrative

Not applicable.

2.5 Safety Officer

Not applicable.

2.6 Liaison Officer

Not applicable.

2.7 Information Officer

2.7.1 Public Information Officer

2.7.2 Community Involvement Coordinator

The next community meeting will be held on August 1, 2011 at 2 pm.

3. Participating Entities

3.1 Unified Command

Indiana Department of Environmental Management Indianapolis Department of Public Works Pike Township Fire Department City of Indianapolis

3.2 Cooperating and Assisting Agencies

Marion County Health Department

4. Personnel On Site

U.S. EPA START Contractor

5. Definition of Terms

ASAOC – Administrative Settlement Agreement on Consent ERRS – Emergency and Rapid Response Services IDEM – Indiana Department of Environmental Management OSC – On-Scene Coordinator POLREP – Pollution Report PRP - Potentially Responsible Party RCRA – Resource Conservation and Recovery Act START – Superfund Technical Assessment and Response Team U.S. EPA – United States Environmental Protection Agency

6. Additional sources of information

6.1 Internet location of additional information/reports

For additional information, please refer to the US EPA lead removal action website at www.epaosc.org/esi

6.2 Reporting Schedule

The next POLREP will be submitted at a date to be determined.

7. Situational Reference Materials

For additional information, please refer to the documents section at www.epaosc.org/esi



CHEMGROUP

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